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MAY 20 1988

SNR-11

CERTIFIED MAIL RETURN
RECEIPT REQUESTED

Stephen W. Holt
Environmental Control Department
NL Industries, Inc.
P.O. Box 1090
Hightstown, N.J. 08520

Dear Mr. Holt:

The purposes of this letter are to 1) withdraw (see attached) that was hand-delivered to you during the RI and 2) establish time frames for the performance of the RI and the submission of the Final Remedial Investigation Report for the Granite City, Illinois site. Portions of this letter dated March 11, 1988 comment letter supersede the relevant portions of the comment letter.

The United States Environmental Protection Agency (U.S. EPA) and Illinois Environmental Protection Agency (IEPA) hereby require NL Industries to perform additional analyses on the soil samples collected previously during the RI. Such analyses shall be performed and results submitted to U.S. EPA and Illinois EPA within 30 days of your receipt of this letter. The soil analysis program shall be conducted as follows: Stored RI soil samples from the 0-3" depth interval at each off-site grid location and each remote area location shall be analyzed for lead, cadmium, arsenic, chromium, zinc, and antimony.

U.S. EPA and Illinois EPA understand that the six month holding time for these RI samples has been exceeded; however, the data that will be generated from these additional analyses can be used in the RI report, if the data are flagged as estimates and mention is made of the holding time exceedance, and provided that the analyses are conducted in accordance with the Quality Assurance Project Plan for the site and that the samples were stored in sealed containers at or below room temperature.

NL Industries shall submit the Final RI Report to U.S. EPA and Illinois EPA within 90 days of your receipt of this letter. The Final RI Report shall incorporate comments provided in my March 11, 1988 letter to you, the results of the additional soil analyses required under this letter, and the air sampling data which is hereby provided as the second attachment to this

letter. With the submission of the Final RI Report, the time frames specified in the March 11, 1985 Agreement and Administrative Order by Consent will again govern the project.

As discussed in our May 4, 1988 phone conversation and other previous phone conversations, U.S. EPA and Illinois EPA will endeavor to: 1) provide NL Industries with ARARs on or around the date upon which U.S. EPA and Illinois EPA comments and/or approval are provided for the Final RI Report, and 2) expedite their respective quality assurance data reviews for the additional soil analytical data to be generated per this letter; however, submission of these quality assurance data reviews will in no way effect the schedule for submission of the Final RI Report. U.S. EPA will also provide you with its quality assurance data review for sampling rounds 2,3 and 4 of the RI.

If you have any questions concerning this letter, please contact me at 312/886-4742.

Sincerely yours,

Brad Bradley
Project Coordinator

Attachments

cc: Ken Miller, IEPA
Nancy Mackiewicz, IAG

bcc: R. Grimes, 5CS-TUB-3
G. Wittman, 5WG-TUB-8
M. Klevs, 5AR-26

5HR-11:ILL/IND;BRADLEY:adr:5/6/88 Telex 4
Rev. 5/12/88:1b

BB 5/19/88

handed to
Holt at
4/18/88 mtg
- superceded
by later
letter

5HR-11

Stephen W. Holt
Environmental Control Department
IL Industries, Inc.
P.O. Box 1090
Hightstown, NJ 08520

Dear Mr. Holt:

The purpose of this letter is to amend several portions of my March 11, 1988 letter to you ("the letter"). Firstly, Major Comment #1, the schedule that comprised Attachment IV, the last paragraph of page 4, and all references to additional or further study are hereby deleted from the letter.

Secondly, on page 4 of the letter, the requirement for submission of the Final RI Report is hereby amended to: IL Industries shall submit the Final RI Report to U.S. EPA and Illinois EPA on or before May 19, 1988.

Lastly, the distinctions between major comments and minor comments made in the letter will be appropriately amended based on discussions between U.S. EPA, Illinois EPA, and IL Industries that will be held on April 18 and 19, 1988.

If you have any questions concerning this letter, please contact me at (312) 266-4742.

Sincerely yours,

Brad Bradley, Project Coordinator
CERCLA Enforcement Section

cc: Ken Miller, IEPA
Nancy Mackiewicz, IAG

bcc: K. Vendl, IL/IN Unit
N. Niedergang, CES
R. Grimes, SCS-TUB-3
G. Wittman, SMG-TUB-8
H. Kleys, SAR-26

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Stephen W. Holt
Environmental Control Department
NL Industries, Inc.
P.O. Box 1090
Hightstown, N.J. 08520

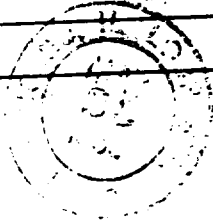
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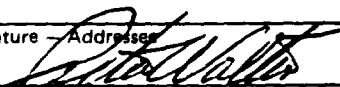
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PS Form 3800 June 1985



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NL INDUSTRIES BRADLEY - 5HR-11